

**NORRIS, McLAUGHLIN & MARCUS, P.A.  
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Attorneys for Defendants David Lawrence,  
Eric Laning, and Safety and Ecology Corporation**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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PAUL C. BACHEMIN, KATHERINE C. :  
THACKER, and JAASON M. WATSON, :  
Plaintiffs, : CASE NO.  
-vs- : ELECTRONICALLY FILED  
DAVID LAWRENCE, ERIC LANING, :  
and SAFETY AND ECOLOGY :  
CORPORATION, :  
Defendants.

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**F.R.C.P. 7.1 STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned  
counsel of record for Defendants, David Lawrence, Eric Laning and Safety and Ecology  
Corporation (“SEC”), hereby states that SEC is a Nevada corporation which is wholly  
owned by Safety & Ecology Holdings Corporation. Safety & Ecology Holdings  
Corporation is wholly owned by Homeland Security Capital Corporation (“HSCC”).  
More than 10% of HSCC is publicly owned.

NORRIS, McLAUGHLIN & MARCUS, P.A.  
Attorneys for Defendants

By: s/ *Patrick T. Collins*

Dated: October 7, 2011